

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Misc. No. 17-151-LPS

**RESERVATION OF RIGHTS OF ACL1 INVESTMENTS LTD.,
ACL2 INVESTMENTS LTD., AND LDO (CAYMAN) XVIII LTD WITH
RESPECT TO THE SPECIAL MASTER'S FINAL RECOMMENDATION**

ACL1 Investments Ltd., ACL2 Investments Ltd., and LDO (Cayman) XVIII Ltd. (together, "ACL") respectfully submit this reservation of rights with respect to the *Special Master's Final Recommendation* (D.I. 1837), and state as follows:¹

As of the date hereof, ACL does not intend to raise any objections to the Final Recommendation that would require discovery. However, ACL expressly reserves all rights to object to the Final Recommendation in the event of any developments or circumstances that could result in, among other things, (i) a reduction in the Purchase Price or in the cash consideration payable to ACL as Additional Judgment Creditors; (ii) a potential delay in the Closing; (iii) the inability of the Recommended Bidder to close the Proposed Sale Transaction and make the payments in accordance with the terms of the Stock Purchase Agreement; or (iv) a bid that may be higher or otherwise better than the Final Recommendation.

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Final Recommendation.

Dated: July 7, 2025

Respectfully submitted.

Of counsel:

ASHBY & GEDDES

Joshua S. Bolian (*pro hac vice*)

/s/ Marie M. Degnan

Jared A. Hagler (*pro hac vice*)

Riley & Jacobson, PLC

1906 West End Avenue

Nashville, Tennessee 37203

(615) 320-3700

jbolian@rjfirm.com

jhagler@rjfirm.com

Marie M. Degnan (#5602)

Randall J. Teti (#6334)

500 Delaware Ave., 8th Floor

P.O. Box 1150

Wilmington, DE 19899

(302) 654-1888

mdegnan@ashbygeddes.com

rteti@ashbygeddes.com

Attorneys for ACL1 Investments Ltd., ACL2

Investments Ltd., and LDO (Cayman) XVIII Ltd.